

# **SIP CONSTRUCTION & OPERATING PERMIT AND TITLE V 502(b)(10) CHANGE APPLICATION REVIEW**

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Facility Name: **Turkey Run Municipal Solid Waste Landfill**

City: Hogansville

County: Meriwether

AIRS #: 04-13-199-00025

Application #: 643275

Date SIP Application Received: March 15, 2022

Permit No: 4953-199-0025-V-03-3

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP</b>	Bradley Belflower	Cynthia Dorrough
<b>SSCP</b>	N/A	N/A
<b>SMU</b>	N/A	N/A
<b>TOXICS</b>	N/A	N/A
<b>Permitting Program Manager</b>		Stephen Damaske

## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1), 391-3-1-.03(2), and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The narrative has no legal standing.

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## **I. Facility Description**

### **A. Existing Permits**

Table 1 below lists the current Title V permit, all administrative amendments and minor and significant modifications to that permit, and any 502(b)(10) changes.

**Table 1: Current Title V Permit and Amendments**

<b>Permit/Amendment Number</b>	<b>Date of Issuance</b>	<b>Description</b>
4953-199-0025-V-03-0	12/7/2015	Renewal Title V permit
4953-199-0025-V-03-1	5/9/2017	Update compliance date for installation and operation of GCCS
4953-199-0025-V-03-2	11/10/2021	Install temporary Flare T2

### **B. Regulatory Status**

#### **1. PSD/NSR/RACT**

Turkey Run Landfill is a minor source with respect to PSD/NSR regulations. Emissions of each PSD regulated pollutant is less than the major source threshold of 250 tons per year. Landfills are not included in the list of 28 source categories that have a 100 tpy threshold to be subject to PSD regulations.

#### **2. Title V Major Source Status by Pollutant**

**Table 2: Title V Major Source Status**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>If emitted, what is the facility's Title V status for the Pollutant?</b>		
		<b>Major Source Status</b>	<b>Major Source Requesting SM Status</b>	<b>Non-Major Source Status</b>
PM	Yes			✓
PM <sub>10</sub>	Yes			✓
PM <sub>2.5</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes			✓
NO <sub>x</sub>	Yes			✓
CO	Yes	✓		
TRS	N/A			
H <sub>2</sub> S	N/A			
Individual HAP	Yes			✓
Total HAPs	yes			✓

## **II. Proposed Modification**

### **A. Description of Modification**

The landfill currently operates open Flare #1 (ID No.: CD01) which has a design capacity of 2,150 standard cubic feet per minute (scfm) and temporary Flare T2 which has a design capacity of 1,000 scfm. Flare T2 was authorized in Permit No. 4953-199-0025-V-03-2 and was planned to be temporary until a new larger flare could be designed, permitted, and installed. New Flare #2 (ID No. CD02) will replace temporary Flare T2.

The existing permit contains all relevant open flare permit conditions, and existing Condition 4.2.6 requires initial performance testing for a “new flare”.

### **B. Emissions Change**

The emissions increase due to the installation of Flare #2 are calculated in Application No. 643275 and are summarized below.

**Table 3: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	Yes	6.13	6.13
PM <sub>10</sub>	Yes	6.13	6.13
PM <sub>2.5</sub>	Yes	6.13	6.13
SO <sub>2</sub>	Yes	47.00	47.00
VOC	Yes	0.74	0.74
NO <sub>x</sub>	Yes	27.13	27.13
CO	Yes	123.67	123.67
TRS	N/A		
H <sub>2</sub> S	N/A		
Individual HAP	Yes	0.13	0.13
Total HAPs	Yes	0.39	0.39

### **C. Title I Modification**

#### **1. PSD/NSR Applicability**

This modification is not a PSD modification.

#### **2. NSPS Modification**

This modification is not an NSPS modification.

3. NESHAP Modification

This modification is not a modification under Part 61.

**III. Facility Wide Requirements**

A. Emission and Operating Caps

None Applicable

B. Applicable Rules and Regulations

This permit already contains all applicable rules and regulations.

C. Compliance Status

The permit application did not indicate any noncompliance issues.

D. Permit Conditions

Turkey Run Landfill's permit already contains all relevant facility-wide conditions, therefore, no changes need to be made.

E. Georgia Toxic Guidelines

Emissions of toxic air pollutants from the landfill are low, therefore a toxic impact assessment was not required.

**IV. Regulated Equipment Requirements**

A. Brief Process Description

Methane and nonmethane organic compounds (NMOC) produced in the landfill are captured by a gas collection and control system and burned in open flares.

B. Equipment List for the New or Modified Process(es)

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
LF	Landfill with GCCS	40 CFR 61 Subpart A	CDF1	Flare #1
		40 CFR 61 Subpart M	T2	Temporary Flare T2
		40 CFR 62 Subpart A	CD02	Flare #2
		40 CFR 62 Subpart OOO		
		40 CFR 63 Subpart A		
		40 CFR 63 Subpart AAAA		
		GA 391-3-1-.02(2)(n)		

C. Equipment & Rule Applicability

This permit already contains all applicable rules and regulations.

D. Permit Conditions

Turkey Run Landfill's permit already contains all relevant permit conditions, therefore, no changes need to be made.

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

Turkey Run Landfill's permit already contains all relevant testing conditions, therefore, no changes need to be made. Note that Condition 4.2.6 requires testing of new flares.

**VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

Turkey Run Landfill's permit already contains all relevant monitoring conditions, therefore, no changes need to be made.

**VII. Other Record Keeping and Reporting Requirements**

Turkey Run Landfill's permit already contains all relevant record keeping and reporting conditions, therefore, no changes need to be made.

**VIII. Specific Requirements**

A. Operational Flexibility

No changes.

B. Alternative Requirements

No changes.

C. Insignificant Activities

No changes.

D. Temporary Sources

No changes.

E. Short-Term Activities

No changes.

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F. Compliance Schedule/Progress Reports

No changes.

G. Emissions Trading

No changes.

H. Acid Rain Requirements/CSPAR

No changes.

I. Prevention of Accidental Releases

No changes.

J. Stratospheric Ozone Protection Requirements

No changes.

K. Pollution Prevention

No changes.

L. Specific Conditions

No changes